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August 16, 2005

Arthur Neal
Director, Program Administration
National Organic Program
USDA-AMS-TMO-NOP
1400 Independence Ave. SW
Room 4008 So., Ag Stop 0268
Washington, DC 20250
Email: National.List@usda.gov

Dear Mr. Neal and Members of the National Organic Standards Board:

This letter is filed by AirOcare, Inc. in reference to the National Organic Program, Sunset Review, Docket Number TM-04-07.

AirOcare, Inc. is a manufacturer of air purification equipment extensively used in the U.S. and around the world by agricultural and food processing companies for the reduction of airborne contaminants in food storage, processing and transportation environments. Our equipment creates and releases small and measured quantities of ozone (O₃) into the air as a secondary sanitizing agent.

Many of our customers grow, process, ship and sell organic products in the U.S. and in the international marketplace. Our equipment gives these customers an opportunity to use an effective air cleaning process in many post-harvest activities rather than other chemical based alternatives. As we are sure you are well aware, the production and use of ozone as a secondary airborne sanitizing agent in facilities leaves no residue, is not added to the product and does not alter the product in any way.

As has been stated by many other commentators, we would also like to thank the USDA and the National Organic Standards Board for the opportunity to comment on the Sunset Review of the 2002 National List. **We support the National List as published and would like to especially support the continued allowance of “ozone/O₃” that is used in storage and in the manufacturing environment by many of our customers who produce and sell Certified Organic products:**

Ozone 205.605(b)

Reasons for supporting continued allowance:

- Ozone has many important uses including wide spread use as an air purification measure in storage, food processing and transportation of food products. Ozone is effective in reducing airborne contaminants such as mold and mildew and reducing ethylene levels which cause premature ripening and rotting in fresh fruits and vegetables.
- For example, without the use of ozone in storage and transportation, organic table grapes will rot and decay. Non-organic table grapes are often gassed with SO₂ which cannot be used with organic grapes.
- Use of ozone in modified atmosphere and controlled atmosphere storage and transportation of fresh fruits and vegetables is a safe and effective method which helps to insure products that are free from pathogens, can be stored for longer periods and transported over longer distances.
- Many more customers of AirOcare are growing and selling organic products as consumers demand organic products in increasing numbers and in increasing varieties throughout the year. Ozone allows our customers to meet these demands. Without ozone on the National List this would be impossible.
- There is no other organic alternative which has the same characteristics and uses.

This substance, as well as the remainder of the National List substances are commonly used throughout the food industry. As part of the NOSB approval process the merits of including these items on the National List were thoroughly reviewed. The list it is made up of critical substances and ingredients necessary for the production of organic consumer products. Many of those ingredients have long been used in the food industry and have allowed for the growth of organic products into multiple grocery categories. The loss of those products would have a ripple effect from the consumer level all the way down to the farm level.

We therefore request that ozone continue to be on the National List and we strongly support the industry position that the substances on the National List all be renewed.

Respectfully submitted,

Robert McDonald
President and CEO
AirOcare, Inc.

cc: Organic Trade Association
National Organic Standards Board

Attachment: "Evaluation Criteria for Substances Added to the National List"